From: <u>MassMaile</u>
Fo: <u>MassMaile</u>

Subject: Capstone Implementation Update

Date: Wednesday, October 3, 2018 12:35:32 PM



The purpose of this message is to provide you with an update regarding the implementation of Capstone – the new email records management approach. We have experienced a few unexpected delays, and we currently anticipate implementing Capstone in early January 2019. As mentioned in previous communications, Capstone uses a role-based approach that retains employees' emails for a specific period of time based on the employee's position. For actions to help prepare for Capstone, please see the "How should I prepare for Capstone?" section below.

Capstone will diminish some of the burden of managing email records while facilitating records management throughout EPA. The National Archives and Records Administration (NARA) approved EPA's Capstone application, and the agency is implementing Capstone consistent with NARA's recommendations. Under the Capstone approach, roles are broken down into two categories: Capstone Officials and non-Capstone employees. The current list of EPA's Capstone Officials comprises 117 designated senior official positions. EPA will update this list and send revisions to NARA periodically.

As a reminder, agency employees will have 90 days from the date an email is created or received to delete any junk mail or personal email. <u>Transitory records</u> should also be deleted within 90 days if no longer needed. (This process is known as "culling.") After the 90-day culling period, Capstone Officials' emails are saved as permanent records and are transferred to NARA when they become 15 years old. Emails of non-Capstone employees will be kept for 10 years and then deleted (unless subject to a litigation hold or other preservation obligation).

If, according to EPA's records schedules, an email record of a non-Capstone employee must be retained longer than 10 years, the email is considered to be an exception, and the employee must save that email in the Enterprise Content Management System (ECMS) using the EZ Email Records Tool. Employees will only need to use the EZ Email Records tool for those records that must be retained more than 10 years. Some of the agency's records schedules have retention periods that begin with the creation or receipt of the record, which in this case would be the creation or receipt of the email. However, other EPA records schedules have retention periods that begin with an event, as opposed to the date of creation or receipt of the record. For example, some EPA contract records are to be retained for six years after the contract is completed or terminated. If you have questions about which records schedules apply to your records, please contact your Records Liaison Officer (RLO). (Note that this intranet site has a link for headquarters, one for regions, and one for lab, center & field offices.)

The retention schedule for Superfund-related records is longer than 10 years. The Office of Land and Emergency Management (OLEM) is in the process of developing a technical solution to move records between Outlook and the Superfund Enterprise Management System (SEMS). In the meantime, these emails will be retained in Outlook. OLEM plans to provide additional guidance on managing Superfund-related email records in Outlook until they can be moved into SEMS.

As a reminder, until Capstone begins, employees should continue handling emails they are sending and receiving in Outlook according to current records management policies and procedures. Here are additional steps employees can take to prepare for the transition to Capstone:

- For non-Capstone employees, email records with a retention period longer than 10 years: Non-Capstone employees <u>must save</u> emails that are subject to a retention schedule that exceeds 10 years in ECMS (does not apply to Superfund-related emails as <u>explained above</u>). The links at the end of this email provide additional information. As mentioned above, some records schedules have retention periods that begin with the receipt or creation of a record (in this case, an email record) and others have retention periods that begin with an event
- Emails subject to litigation hold: You must continue to retain emails that are subject to a litigation hold or other preservation obligation in your email box. You should not delete any emails subject to litigation holds or other obligations, regardless of their record status.

You should have received an email notice from the issuing attorney notifying you of the existence and scope of any litigation holds. EPA will continue to retain emails from individuals identified as subject to litigation holds after the Capstone retention date. Litigation holds are legal obligations. If you have any questions about your litigation hold obligations, contact the EPA case attorney who issued the litigation hold.

- Emails subject to an official information request (such as a pending or recently closed FOIA request or appeal): If you have emails concerning or responsive to a pending FOIA request, a recently closed FOIA request (within 90 days), or a FOIA appeal, you must continue to retain those emails. If you have questions related to FOIA records, please contact the EPA employee or program office that is coordinating the FOIA response.
- Emails not subject to any preservation obligation: You should delete emails that are not subject to any preservation obligations such as mass mailers, news articles, Talent Hub announcements, or other emails that are not records.
- Personal emails: You should delete personal messages that are not relevant to EPA's work.

For more information, see:

- Information on what constitutes a record
- A retention matrix listing the records schedules that exceed 10 years. The retention period for some schedules begins with the creation
 or receipt of a record and others have retention periods that begin with an event. The list provided through this link is only a subset of
 schedules that employees may need to use for saving into ECMS.

- How to save Outlook email records in ECMS
- FAQs on email and records
- List of EPA's Capstone Officials
- FAQs on Capstone Email and Records

We will keep you informed as we prepare for Capstone implementation. If you have any questions, please contact the following subject matter experts:

- <u>Robert Johnston</u>, Director, Enterprise Records Management Division, 202-566-1637
- John Ellis, EPA Records Officer, 202-566-1643
- Records Help Desk, 202-566-1494
- Jennifer Sutton (703-603-8718) or Steve Wyman (703-603-8882), OLEM (for questions regarding Superfund-related records)